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BY:

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury '08 CR 0086 LAB

11	UNITED STATES OF AMERICA,)	Criminal Case No. _____
12	Plaintiff,)	<u>I N D I C T M E N T</u>
13	v.)	Title 8, U.S.C.,
14	ALEJANDRO PEREZ,)	Sec. 1324(a)(2)(B)(ii) -
15	Defendant.)	Bringing in Illegal Aliens for
16)	Financial Gain; Title 18, U.S.C.,
17)	Sec. 2 - Aiding and Abetting;
)	Title 8, U.S.C.,
)	Sec. 1324(a)(2)(B)(iii) - Bringing
)	in Illegal Aliens Without
)	Presentation

The grand jury charges:

Count 1

On or about December 28, 2007, within the Southern District of California, defendant ALEJANDRO PEREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jin Bin Zheng, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 2

On or about December 28, 2007, within the Southern District of California, defendant ALEJANDRO PEREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jin Bin Zheng, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

Count 3

On or about December 28, 2007, within the Southern District of California, defendant ALEJANDRO PEREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Xu Xian Dong, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 4

On or about December 28, 2007, within the Southern District of California, defendant ALEJANDRO PEREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Xu Xian Dong, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon

1 arrival did not bring and present said alien immediately to an
2 appropriate immigration officer at a designated port of entry; in
3 violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

4 Count 5

5 On or about December 28, 2007, within the Southern District of
6 California, defendant ALEJANDRO PEREZ, with the intent to violate the
7 immigration laws of the United States, knowing and in reckless
8 disregard of the fact that an alien, namely, Zeng Biao Wang, had not
9 received prior official authorization to come to, enter and reside in
10 the United States, did bring to the United States said alien for the
11 purpose of commercial advantage and private financial gain; in
12 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
13 and Title 18, United States Code, Section 2.

14 Count 6

15 On or about December 28, 2007, within the Southern District of
16 California, defendant ALEJANDRO PEREZ, with the intent to violate the
17 immigration laws of the United States, knowing and in reckless
18 disregard of the fact that an alien, namely, Zeng Biao Wang, had not
19 received prior official authorization to come to, enter and reside in
20 the United States, did bring to the United States said alien and upon
21 arrival did not bring and present said alien immediately to an
22 appropriate immigration officer at a designated port of entry; in
23 violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

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Count 7

On or about December 28, 2007, within the Southern District of California, defendant ALEJANDRO PEREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Qiang Shou Zheng, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 8

On or about December 28, 2007, within the Southern District of California, defendant ALEJANDRO PEREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Qiang Shou Zheng, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

Count 9

On or about December 28, 2007, within the Southern District of California, defendant ALEJANDRO PEREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Hua He, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the


1 purpose of commercial advantage and private financial gain; in
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
3 and Title 18, United States Code, Section 2.

4 Count 10


5 On or about December 28, 2007, within the Southern District of
6 California, defendant ALEJANDRO PEREZ, with the intent to violate the
7 immigration laws of the United States, knowing and in reckless
8 disregard of the fact that an alien, namely, Hua He, had not received
9 prior official authorization to come to, enter and reside in the
10 United States, did bring to the United States said alien and upon
11 arrival did not bring and present said alien immediately to an
12 appropriate immigration officer at a designated port of entry; in
13 violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

14 DATED: January 9, 2008.

15 A TRUE BILL:

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17 _____
18 Foreperson

19 KAREN P. HEWITT
20 United States Attorney

21 By: 
22 CARLA J. BRESSLER
23 Assistant U.S. Attorney
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